

From: Michael S. Martinez
To: [Ludmer, Ivan](#)
Cc: [Nadimi Law](#); [Courtney Burns](#); [Jessica J. Nelson](#); [Daniel R. Haller](#); lefevourg@ibld.com; [Donald G. Heeman](#); [Lathrop, Sara J](#); [Robertson, Heather P.](#)
Subject: Re: FW: service email - Lopez
Date: Friday, August 03, 2018 4:03:18 PM
Attachments: [image002.gif](#)

Ivan,

I'm out of the office today but I will look into this and let you know early next week.

Mike

On Fri, Aug 3, 2018, 3:54 PM Ludmer, Ivan <ivan.ludmer@minneapolismn.gov> wrote:

Michael, Courtney, and Michael,

We still have not received a response or documents addressing the items in the attached June 7, 2018 letter, and so have scheduled a motion to compel hearing on Wednesday, August 22, 2018, at 1:30.

I believe we have met all meet-and-confer requirements with our previous unanswered correspondence. We will be asking for attorneys' fees incurred with respect to the discovery deficiencies described in the letter. This email is to give one more opportunity to remedy them and avoid that request before we incur further fees on this matter.

Thanks,

Ivan

Ivan Ludmer | Assistant City Attorney, City of Minneapolis

*gender pronouns: he/him/his**

350 South Fifth Street, Room 210

Minneapolis, MN 55415

T 612-673-2478 F 612-673-3362

[*Why this matters](#)

From: Lathrop, Sara J
Sent: Wednesday, June 20, 2018 11:40 AM
To: Michael Martinez <msmartinez@mhlegalgroup.com>; mail@nadimilaw.com;
cburns@mhlegalgroup.com
Cc: 'Jessica J. Nelson' <JNelson@Felhaber.com>; 'Daniel R. Haller' <DHaller@Felhaber.com>;
lefevourg@jbltd.com; pacinik@jbltd.com; 'Donald G. Heeman' <DHeeman@Felhaber.com>;
Ludmer, Ivan <ivan.ludmer@minneapolismn.gov>; Robertson, Heather P.
<Heather.Robertson@minneapolismn.gov>
Subject: RE: service email - Lopez

Dear Michael, Michael and Courtney:

We have not received a response of any kind to my June 7 letter. Our office's letters, and these emails, and our phone calls, have been attempts to meet and confer on these issues. We plan to move to compel and would ask the Court to hear our motion at the time same time as your motion to amend the scheduling order. We hope that the Court's intervention will not be necessary.

Relatedly, using the authorization you provided, we have been trying to obtain Mr. Lopez's treatment records from Jerri Kounce with no success. Have you obtained his records from this provider? If so please produce them today.

Thank you,

Sara

[Sara J. Lathrop](#)

Assistant City Attorney

City of Minneapolis – City Attorney's Office

350 S. Fifth St. – Room 210

Minneapolis, MN 55415

Office: 612-673-2072

sara.lathrop@minneapolismn.gov

From: Lathrop, Sara J
Sent: Thursday, June 07, 2018 3:47 PM
To: 'Michael Martinez' <msmartinez@mhlegallgroup.com>; mail@nadimilaw.com
Cc: 'Christiana M Martenson' <Christiana.Martenson@hennepin.us>; 'Jessica J. Nelson' <JNelson@Felhaber.com>; 'Daniel R. Haller' <DHaller@Felhaber.com>; lefevourg@jbltd.com; 'James Keeler' <James.Keeler@hennepin.us>; pacinik@jbltd.com; 'Donald G. Heeman' <DHeeman@Felhaber.com>; Ludmer, Ivan <ivan.ludmer@minneapolismn.gov>; Robertson, Heather P. <Heather.Robertson@minneapolismn.gov>; cburns@mhlegallgroup.com
Subject: service email - Lopez

Hi Michael and Michael,

Please see the attached correspondence in the Lopez matter. Thank you.

Sara

Sara J. Lathrop

Assistant City Attorney

City of Minneapolis – City Attorney's Office

350 S. Fifth St. – Room 210

Minneapolis, MN 55415

Office: 612-673-2072

sara.lathrop@minneapolismn.gov

From: Michael Martinez [<mailto:msmartinez@mhlegalgroup.com>]
Sent: Friday, June 01, 2018 9:32 PM
To: Lathrop, Sara J <Sara.Lathrop@minneapolismn.gov>
Cc: mail@nadimilaw.com; 'Christiana M Martenson' <Christiana.Martenson@hennepin.us>; 'Jessica J. Nelson' <JNelson@Felhaber.com>; 'Daniel R. Haller' <DHaller@Felhaber.com>; lefevourg@jbltd.com; 'James Keeler' <James.Keeler@hennepin.us>; pacinek@jbltd.com; 'Donald G. Heeman' <DHeeman@Felhaber.com>; Ludmer, Ivan <ivan.ludmer@minneapolismn.gov>; Robertson, Heather P. <Heather.Robertson@minneapolismn.gov>; cburns@mhlegalgroup.com
Subject: Lopez v. MN Vikings Football Stadium, et al., No. 17-cv-1179 - Plaintiff's Amended Discovery Responses to City of Minneapolis Defendants

Sara,

Please find attached Plaintiff's Amended Discovery Responses. (verification page for Interrogatories to follow as well as supplemental discovery production)

Thanks,

Mike

Michael S. Martinez

Martinez Hsu, P.C.

4001 Airport Freeway, Ste 150

Bedford, Texas 76021

682-224-7810

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From: Lathrop, Sara J <Sara.Lathrop@minneapolismn.gov>
Sent: Friday, June 1, 2018 9:07 AM

To: Courtney Burns <cburns@mhlegalgroup.com>
Cc: 'Michael Martinez' <msmartinez@mhlegalgroup.com>; mail@nadimilaw.com; Christiana M Martenson <Christiana.Martenson@hennepin.us>; Jessica J. Nelson <JNelson@Felhaber.com>; Daniel R. Haller <DHaller@Felhaber.com>; lefevourg@jbltd.com; James Keeler <James.Keeler@hennepin.us>; pacinik@jbltd.com; Donald G. Heeman <DHeeman@Felhaber.com>; Ludmer, Ivan <ivan.ludmer@minneapolismn.gov>; Robertson, Heather P. <Heather.Robertson@minneapolismn.gov>
Subject: RE: [External] Plaintiff's Motion to Amend Scheduling Order - Lopez v. MN Vikings Football Stadium, et al., No. 17-cv-1179 (PAM/TNL)

Courtney,

The City Defendants also oppose Plaintiff's proposed modification of the scheduling order.

Thank you,

Sara

Sara J. Lathrop

Assistant City Attorney

City of Minneapolis – City Attorney's Office

350 S. Fifth St. – Room 210

Minneapolis, MN 55415

Office: 612-673-2072

sara.lathrop@minneapolismn.gov

From: Jessica J. Nelson [<mailto:JNelson@Felhaber.com>]

Sent: Friday, June 01, 2018 8:26 AM

To: Christiana M Martenson; Courtney Burns; Lathrop, Sara J; Ludmer, Ivan; Daniel R. Haller; lefevourg@jbltd.com; pacinik@jbltd.com; James Keeler; Donald G. Heeman

Cc: 'Michael Martinez'; mail@nadimilaw.com

Subject: RE: [External] Plaintiff's Motion to Amend Scheduling Order - Lopez v. MN Vikings Football Stadium, et al., No. 17-cv-1179 (PAM/TNL)

Good morning,

The defendants we represent also oppose Plaintiff's proposed modification of the scheduling order.

Jessica J. Nelson

Attorney

220 South 6th Street, Suite 2200, Minneapolis, MN 55402
Direct: 612.373.8419 | Main: 612.339.6321 | Fax: 612.338.0535
jnelson@felhaber.com
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From: Christiana M Martenson [<mailto:Christiana.Martenson@hennepin.us>]

Sent: Thursday, May 31, 2018 5:07 PM

To: Courtney Burns; Jessica J. Nelson; Sara Lathrop; ivan.ludmer@minneapolismn.gov; Daniel R. Haller; lefevourg@jbltd.com; pacinik@jbltd.com; James Keeler; Donald G. Heeman

Cc: 'Michael Martinez'; mail@nadimilaw.com

Subject: RE: [External] Plaintiff's Motion to Amend Scheduling Order - Lopez v. MN Vikings Football Stadium, et al., No. 17-cv-1179 (PAM/TNL)

Dear Courtney,

Thanks for your email. The Hennepin County Defendants oppose the Plaintiff's proposed modification of the scheduling order.

Thank you,

Christy

Christy Martenson

Assistant County Attorney

Hennepin County Attorney's Office - Civil Division

A-2000 Government Center

300 South Sixth Street

Minneapolis, MN 55487

Ph: 612-348-5506

Fx: 612-348-8299

christiana.martenson@hennepin.us

From: Courtney Burns <cburns@mhlegalgroup.com>

Sent: Wednesday, May 30, 2018 5:01 PM

To: 'Jessica J. Nelson' <JNelson@Felhaber.com>; Sara Lathrop
<Sara.Lathrop@minneapolismn.gov>; ivan.ludmer@minneapolismn.gov; 'Daniel R. Haller'
<DHaller@Felhaber.com>; lefevourg@jbltd.com; pacinik@jbltd.com; James Keeler
<James.Keeler@hennepin.us>; Christiana M Martenson <Christiana.Martenson@hennepin.us>;
'Donald G. Heeman' <DHeeman@Felhaber.com>

Cc: 'Michael Martinez' <msmartinez@mhlegalgroup.com>; mail@nadimilaw.com

Subject: [External] Plaintiff's Motion to Amend Scheduling Order - Lopez v. MN Vikings Football Stadium, et al., No. 17-cv-1179 (PAM/TNL)

Counsel,

Please consider this Mr. Martinez's meet and confer regarding Plaintiff's motion to amend the scheduling order (in addition to the discussions via phone calls and emails regarding these dates). He plans to file the attached memorandum with a motion to amend tomorrow. Please let him know if you do not agree to any part of the requested changes, or if you agree to parts, please indicate which ones.

Thank you,

Courtney E. Burns
Associate Attorney

Martinez Hsu

A Professional Corporation

4001 Airport Freeway, Suite 150

Bedford, Texas 76021

Phone: 682-224-7810

Fax: 682-730-8998

Email: cburns@mhlegallgroup.com

Visit us at <http://mhlegallgroup.com>

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